

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

APR - 3 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

MOBILEMEDIA CORPORATION, et al. )

WT Docket No. 97-115

Applicant for Authorizations and Licensee  
of Certain Stations in Various Services )

To: The Commission )

DOCKET FILE COPY ORIGINAL  
XXXXX FILE COPY ORIGINAL

COMMENTS OF INTERVENOR SECURED LENDERS  
IN SUPPORT OF MOBILEMEDIA REQUEST FOR  
EXTENSION OF STAY

Intervenor The Chase Manhattan Bank, as agent for the secured lenders to MobileMedia Communications, Inc. ("the Secured Lenders"), respectfully files these comments in support of the request filed by MobileMedia Corporation and its subsidiaries, debtors-in-possession ("MobileMedia"), for a six-month extension of the stay in these proceedings.

As MobileMedia has demonstrated in its request and in its monthly status reports filed with the Commission, it has made and continues to make diligent efforts to pursue a sale or reorganization for the benefit of its creditors that will be consistent with the requirements of Second Thursday.<sup>1/</sup> The Secured Lenders have supported the plan of reorganization filed by MobileMedia on January 27, 1998. However, that plan is currently opposed by the unsecured Creditors' Committee, and, as MobileMedia has demonstrated, the bankruptcy court's schedule for determining whether to confirm the plan is likely to extend into the fall of 1998. At this

<sup>1/</sup> Second Thursday Corp., 22 F.C.C.2d 515, recon. granted, 25 F.C.C.2d 112 (1970).

point, a six-month extension appears to be one that will accommodate the course of the bankruptcy proceedings,<sup>2/</sup> and will avoid what the Commission has recognized would be “unquestionably a danger of severe harm to a multitude of innocent creditors” from resumption of the hearing. FCC 97-197 (rel. June 6, 1997), at ¶ 13.

As the Secured Lenders advised the Commission in supporting MobileMedia’s initial request for stay,<sup>3/</sup> they have a vital interest -- as the largest stakeholders in the enterprise -- in achieving a prompt resolution of MobileMedia’s bankruptcy. To this end, the Secured Lenders intend to cooperate with MobileMedia in preparing and filing Second Thursday applications as soon as practicable, consistent with developments in the bankruptcy proceedings and with the need to provide necessary information with respect to the proposed transferees.

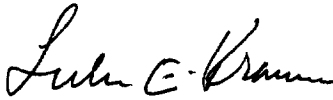
For the foregoing reasons, the Secured Lenders urge that MobileMedia’s request for extension of stay be granted.

---

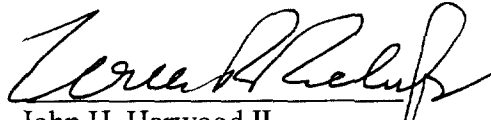
<sup>2/</sup> See LaRose v. FCC, 494 F.2d 1145 (D.C. Cir. 1974).

<sup>3/</sup> See Comments of Secured Lenders in Support of Emergency Motion of MobileMedia for Stay of Proceedings at 3 (April 29, 1997).

Respectfully submitted,



Lillian E. Kraemer  
Steven M. Fuhrman  
Kerry Mithalal



John H. Harwood II  
William R. Richardson, Jr.  
Michael A. McKenzie

SIMPSON THACHER & BARTLETT  
425 Lexington Avenue  
New York, New York 10017  
(212) 455-2000

WILMER, CUTLER & PICKERING  
2445 M Street, N.W.  
Washington, D.C. 20037-1420  
(202) 663-6000

Counsel for The Chase Manhattan Bank,  
Agent for Secured Prepetition and Postpetition Lenders

April 3, 1998

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April, 1998, I caused copies of the foregoing  
Comments of Intervenor Secured Lenders In Support of MobileMedia Request for Extension of  
Stay to be mailed via first-class postage prepaid mail to the following:

The Honorable William E. Kennard\*  
Federal Communications Commission  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554

The Honorable Michael K. Powell\*  
Federal Communications Commission  
1919 M Street, N.W.  
Room 844  
Washington, D.C. 20554

The Honorable Susan Ness\*  
Federal Communications Commission  
1919 M Street, N.W.  
Room 832  
Washington, D.C. 20554

The Honorable Harold Furchtgott-Roth\*  
Federal Communications Commission  
1919 M Street, N.W.  
Room 802  
Washington, D.C. 20554

The Honorable Gloria Tristani\*  
Federal Communications Commission  
1919 M Street, N.W.  
Room 826  
Washington, D.C. 20554

Christopher J. Wright, Esq.\*  
General Counsel  
Federal Communications Commission  
1919 M Street, N.W.  
Room 614  
Washington, D.C. 20554

David Solomon, Esq.  
Deputy General Counsel  
Federal Communications Commission  
1919 M Street, N.W.  
Room 614  
Washington, D.C. 20554

John I. Riffer\*  
Office of the General Counsel  
Federal Communications Commission  
1919 M Street, N.W.  
Room 610  
Washington, D.C. 20554

Daniel B. Phythyon\*  
Acting Chief  
Wireless Telecommunications Bureau  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554

Rosalind K. Allen\*  
Deputy Chief  
Wireless Telecommunications Bureau  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554

---

\*Hand Delivery

Gary P. Schonman\*  
D. Anthony Mastando  
Enforcement Division  
Wireless Telecommunications Bureau  
2025 M Street, N.W., Room 8308  
Washington, D.C. 20554

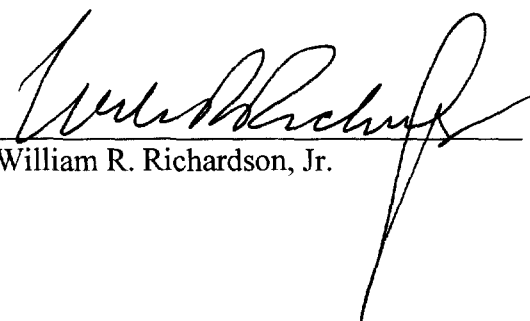
Richard E. Wiley  
Robert L. Pettit  
Nancy J. Victory  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

David Spears  
James M. Aquilina  
Richards Spears Kibbe & Orbe  
One Chase Manhattan Plaza, 57th Floor  
New York, NY 10005-1413

The Honorable Joseph Chachkin\*  
Federal Communications Commission  
2000 L Street, N.W.  
Second Floor  
Washington, D.C. 20554

Phillip L. Spector  
Patrick S. Campbell  
Paul, Weiss, Rifkind, Wharton & Garrison  
1615 L Street, N.W., Suite 1300  
Washington, D.C. 20036

Ky E. Kirby  
Swidler & Berlin Chtd.  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007-5116



William R. Richardson, Jr.